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2 **IN THE UNITED STATES DISTRICT COURT**
3 **FOR THE DISTRICT OF MARYLAND**

4 MARYLAND SHALL ISSUE, INC., *et al.*,)
5)
6 *Plaintiffs,*)
7)
8 v.) Case No. 8:21-cv-01736-TDC (L)
9) Case No. 8:22-cv-01967-DLB
MONTGOMERY COUNTY, MD.,)
)
Defendant.)

10 **DECLARATION OF THOMAS PAINE NO.1**

11 COMES NOW, the declarant, THOMAS PAINE NO.1, and hereby solemnly
12 declares under penalties of perjury and states that based upon personal knowledge that the contents
13 of the following declaration are true:

14 1. My name is THOMAS PAINE NO.1, and I am member of Maryland Shall Issue,
15 Inc., a plaintiff in the above-captioned matter. I am an adult over the age of 18, a Frederick County
16 Maryland resident and I am fully competent to give sworn testimony in this matter. THOMAS
17 PAINE NO. 1 is not my real name. I respectfully request that my identity remain anonymous.
18 While I provide armed security to my Church, I have done so anonymously and the effectiveness
19 of that security would be undermined if my role in doing so became public knowledge. Moreover,
20 regrettably, I am concerned that my livelihood would be jeopardized should I be publicly
21 associated with pro-Second Amendment advocacy.

22 2. I am a Deacon at my Church in Montgomery County and I serve (anonymously)
23 as a volunteer plain-clothed armed security member of my Church located in Montgomery County
24 Maryland with the permission of the pastor and church council.

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2 3. I chose to obtain my wear and carry permit in 2019 when the church decided to
3 form a security team since the church dealt with large sums of checks and cash during Sunday
4 services. I have attended the church for 53 years and back in the late 80's early 90's the church
5 had anonymous bomb threats against it while my mother was the church secretary to which the
6 Montgomery County police would do patrols on Sundays and Wednesdays during services for a
7 few months. Since the shutdowns of Covid the church can no longer pay for an armed security
8 service, it is now just armed church members providing security for the church. Also due to the
9 violence seen across the country in every day places one might find themselves at a store or church
10 like the Walmart shooting in Chesapeake VA on November 22, 2022 where 6 people were killed
11 and 4 injured; Nightclub shooting in Colorado Springs on November 19, 2022 where 5 people
12 were killed and 25 others were injured; Greenwood Park Mall in Indiana on July 17, 2022 where
13 3 people were killed before he gunman was killed by an armed citizen stopping the attack;
14 Collierville Kroger Shooting on September 23, 2021 where one was killed and 14 injured;
15 Colorado Springs Shooting at a trailer park on May 9, 2021 where 6 people were killed at a
16 birthday party in a trailer park; West Freeway Church of Christ in White Settlement, Texas on
17 December 29, 2019 where 2 congregants were killed before armed church security ended the threat
18 by shooting the perpetrator; Sutherland Springs Church Shooting in Sutherland Springs, Texas on
19 November 5, 2017 where 26 people were killed and 22 injured; Charleston church shooting in
20 Charleston, South Carolina on June 17, 2015 where 9 congregants were killed. Our church has
21 been concerned for safety for several years as we used to hire an off duty officer to provide security
22 but have moved to armed church members.

1 4. Other religions have also experienced deadly attacks such as Jewish synagogues.
2 Terrorists had attacked and killed all the members of the Mumbai (Bombay) Chabad Synagogue
3 in India. Serious armed attacks against Jewish institutions in the U.S. had occurred in Los Angeles,
4 Washington D.C., New York, Baltimore, and many other cities. Many congregants were killed at
5 a synagogue in Har Nof Jerusalem; four people were executed at the Hyper Cacher market (Kosher
6 Supermarket) in Paris; a congregant was killed outside the synagogue in Copenhagen, a child and
7 son of the Chabad Rabbi were attacked in New Zealand.

8 5. We know the police are spread thin and a terrorist can inflict great deal of harm
9 before police could arrive at our location. In our congregation, small prayer groups meet early in
10 the morning on weekends as well as in the evening during the week on occasion and are
11 particularly vulnerable at these times. Bill 21-22E has made it impossible for our churches security
12 team members to transport a firearm to the church to protect the members thus leaving us at the
13 mercy of the evil that exists in the world.

14 6. By its text, Bill 21-22E has banned the possession and transport of firearms at
15 and within 100 yards of health care facilities (doctors' offices, urgent care facilities, nursing homes,
16 hospitals) Parks (any kind) and any government property or facility operated or controlled by
17 Montgomery County. The bill also removes the exception for authorized Maryland Wear and
18 Carry permit holders. The effect of this on any permit holder is that in large parts of the County it
19 is now a crime to carry with a permit in order to protect oneself. It is very difficult to know which
20 one of these restricted places is within 100 yards (300 feet) of any place a permit holder may be.
21 Because of these 100-yard exclusion zones, and the uncertainty concerning their locations, it is
22 difficult if not impossible to transport a firearm in the County, including to and from the Church,
23 with a wear and carry permit.

7. By its text, Bill 21-22E has banned the possession and transport of firearms at and within 100 yards of a “house of worship.” That ban has stripped Christian Churches, as well as other houses of worship in the County, of the armed protection provided by members of their congregations like me, thus leaving these places of worship vulnerable to attack. The urgency and need for such protection cannot be overstated.

8. I hereby declare and that the factual allegations in the complaint that relate or refer to myself and my Church are true.

/s/ Thomas Paine No. I

Dated: November 30, 2022:
THOMAS PAINE NO.1